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Via Email and U.S. Mail

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Re: Outstanding issues with Defendant's Discovery Responses

Caekaert & Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al.
Rowland & Schulze v. Watchtower Bible and Tract Society of New York, Inc., et al.

Dear Counsel,

This letter is directed to outstanding issues with Defendant's discovery responses.

Noncompliance with the Court's Prior Order, Doc. 85

On August 24, 2021, the Court found that WTNY's answers to jurisdictional discovery Interrogatory Nos. 9 and 15 were "vague to the point of non-responsive" and ordered it to "fully and completely respond." (Doc. 85 at 11-12.) While WTNY subsequently supplemented its answers with information Plaintiffs and the Court already knew about WTNY has never provided a full and thorough answer to the interrogatories.

In the same Order, the Court told WTNY "[t]o supplement their discovery responses with sufficient details on the search efforts undertaken for the Court to determine if those efforts were reasonable." for any response in which no documents or information was provided. (Doc. 85 at 17). To date, WTNY has not complied with the Court's order. Please supplement the responses with the details of the search performed, if any, as ordered.¹

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¹ To the extent that Jon Wilson's Oct. 28, 2022, letter expands on the scope of the search performed for requested documents (if at all), Plaintiffs request that such information be added to a supplemental discovery response, as required by the Court's Order.

Interrogatory No. 14 (Caekaert) and No. 13 (Rowland)

On October 13, 2022, Plaintiffs identified a number of areas where WTNY's answers to these interrogatories failed to be responsive. On October 28, 2022, Jon Wilson provided a letter to Plaintiffs with some additional information. Please supplement WTNY's formal discovery answer with this additional information, as well as all other information sought in the interrogatories.

Interrogatory No. 15 (Caekaert) and No. 14 (Rowland)

On October 13, 2022, Plaintiffs identified issues with the responsiveness of WTNY's answers to the above referenced interrogatories. Jon Wilson's October 28, 2022, letter appears to provide some additional responsive information. Please supplement WTNY's formal discovery answers with this additional information, as well as all other information sought in the interrogatories.

Interrogatories 17-18 (Caekaert) and 16-17 (Rowland)

On October 13, 2022, Plaintiffs identified issues with the responsiveness of WTNY's answers to the above referenced interrogatories. Jon Wilson's October 28, 2022, letter appears to provide some additional responsive information. Please supplement WTNY's formal discovery answers with this additional information, as well as all other information sought in the interrogatories.

Interrogatory No. 5 (Caekaert and Rowland)

WTNY has not responded to subpart number 4 of Interrogatory No. 5 which asked WTNY to identify whether the source material for CM entries into the database that WTNY describes in its answer still exists, and if not, "describe when and why it was destroyed and who destroyed it". Please provide a fully responsive answer to this part of Int. No. 5.

Requests for Production No. 94 – 96 (Caekaert) and 92 – 94 (Rowland)

If documents responsive to these RFPs have in fact been produced or are being withheld based on an assertion of privilege WTNY must identify them by specific Bates number or Privilege Log entry. Please supplement your responses by doing so.

Please supplement your discovery responses as outlined above by October 16, 2023. Enclosed please find Plaintiffs' Seventh Combined Discovery to WTNY.

Sincerely,

MEYER, SHAFFER & STEPANS, PLLP



Ryan R. Shaffer